

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

EMMA KOE et al.,

Plaintiffs,

v.

CAYLEE NOGGLE et al.,

Defendants.

Case No. _____

DECLARATION OF RITA SOE

I, Rita Soe,¹ hereby declare and state as follows:

1. I am over the age of eighteen, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to those facts if called to do so.

¹ Because of concerns about my child's privacy and safety, I am seeking to proceed in this case under a pseudonym. *See Motion to Proceed Pseudonymously*, filed concurrently herewith. In addition, contemporaneous with signing this declaration, I have signed with my legal name a separate copy of this declaration. My attorneys have a copy of that separate declaration.

2. I am a member of the Georgia Chapter of TransParent and mother of a transgender child, Brent.
3. My husband, Bill, and I have been married for almost twenty years.
4. Georgia is our home. I was born in Atlanta, moved away when I was seven years old, and have lived in Georgia since my return in 2003. My husband has lived in Georgia his whole life; he was born in Augusta, grew up by Stone Mountain, went to college in Georgia, and currently works for a large corporation headquartered in Georgia.
5. We have two children whom we love and support. Both were born and raised in Georgia. We strive to ensure that they have every opportunity to live full and happy lives. Their health, safety, and well-being are of the utmost importance to us. We have thus far been grateful to raise them in Georgia, where they are surrounded by our supportive extended family and their own network of childhood friends.
6. Our older child, Brent, is a sixteen-year-old boy. Brent is also transgender. His natal sex was female. Our younger child is a fourteen-year-old boy who is cisgender.
7. Brent is passionate, inquisitive, and a deep thinker. He is a voracious reader and loves doing deep dives into topics that interest him. He enjoys music,

visual arts, and writing, and plays the guitar and bass. He also loves animals and has always been sensitive to the needs of our pet dogs and cats.

8. In early 2020, when Brent was twelve years old, he was experiencing physical changes associated with undergoing female puberty. These changes to his body appeared to be distressing to him. I believe this was the beginning of when Brent began intimating that he is transgender.
9. Brent has been under the care of a psychologist since 2021.
10. When he was fourteen years old, Brent explained to me that he was a transgender boy. At the request of Brent, I joined his appointment with his psychologist, where his psychologist explained that Brent is transgender, that he suffered from gender dysphoria, and the benefits of supporting Brent in his male gender identity including using a new name and “he/him” pronouns. We discussed how to support Brent’s social transition, including boys’ hairstyles and clothes.
11. Learning that Brent was transgender was something I needed to wrap my head around. I took steps to educate myself about what this would mean for my child. I joined TransParent to get support and learn from other parents of transgender children. I did my own research by reading books, listening to

podcasts, and reaching out to a friend who has a daughter currently receiving hormone therapy.

12. After coming out to me, Brent also was out and open about his gender with his friends. It took some time for him to come out to his father and brother because he knew he would then have to start explaining to his extended relatives.

13. In February of this year, Brent explained that he was a transgender boy to his father and brother. Both are supportive of his male gender identity and recognize the necessity of social transition for Brent's mental wellbeing. Subsequently, Brent came out at his high school.

14. In May, Brent came out to his paternal grandparents. He now expresses his male gender identity in all aspects of his life. His mental health has significantly improved since aligning his male gender expression with his male gender identity. He is a happier and more authentic version of himself. I can tell that he is more at ease because he does not have to worry about hiding anything.

15. I regularly discuss Brent's gender dysphoria with his psychologist. We are in alignment with continuing to treat his dysphoria by supporting his gender identity and starting hormone therapy in the foreseeable future.

16. Brent wants to start hormone therapy now to minimize his distress. My husband and I would like to wait a little longer, and to allow Brent to continue with psychotherapy and living in conformity with his gender identity for some time before initiating a hormone regimen.

17. There is every indication that my child will need to start hormone therapy to treat his gender dysphoria soon. I would like to do so thoughtfully, in consultation with his medical and mental health providers. If S.B. 140 remains in place, this conscientious parenting plan will no longer be an option. S.B. 140 has put us in the position of choosing between rushing a medical decision and potentially risking the mental health and well-being of our child.

18. I joined TransParent in the summer of 2022 and have been a member for about a year. As a member, I attended, and continue to attend, meetings with other parents of transgender kids in Georgia. The group functions as a support system, an information-sharing platform, and an advocacy organization for parents of transgender children. I feel a connection and kinship with the other members, who are parents like me trying to support our transgender children.

19. Earlier this year, I attended meetings at the Georgia legislature to advocate against S.B. 140. I told a Georgia legislator who supported the bill that I have a transgender son and that S.B. 140 would take away my parental right to get necessary care for my child. He responded by saying, “you know you have until July 1 to get your kid on hormones.”
20. My husband and I are not comfortable being rushed to make a medical decision based on arbitrary legislative timelines, intimidation, and fear. We are discussing the appropriate care we believe Brent needs, in consultation with Brent and his healthcare providers. We want the right to choose the timeline in which our child gets necessary care.
21. I do not want to, and should not have to, travel to another state to get my child medical care. It would place an unnecessary burden on my family. Not only would it cost time and money to travel, but it would jeopardize Brent’s continuity of care if we have to travel out of state every time we have to monitor and adjust Brent’s hormone levels.
22. Because of S.B. 140, my family and I have started talking about leaving Georgia and relocating to a state that does not infringe on my right to make health and medical decisions for my child. I have lived in Georgia for the past twenty years, my husband’s job is here, and I love my community. My

husband's parents and many family members live in Georgia and have been an important support system for my family. I do not want to be uprooted, or uproot my family, but may have to for my child to access necessary treatment for his gender dysphoria without state interference.

23. Brent has been a different child ever since coming out and social transitioning. Prior to Brent's transition, he was reserved and did not feel comfortable in his skin. However, since February when Brent was fully out at home and publicly, he has started to show his true and authentic self. I have noticed a huge improvement in his confidence, including his singing in front of his entire school—something he would never have undertaken before his transition. I fear a regression and mental decompensation if we are unable to support his need for hormone therapy in the near future.

24. I want Brent to continue to develop with all the benefits of medically necessary healthcare as soon as we and our providers feel it is appropriate.

25. It has been difficult for Brent to come out at a time when S.B. 140 was introduced and passed into law. He feels targeted and vulnerable knowing that the state is passing laws that discriminate against him and that will make his life harder.

26.S.B. 140 is cruel and unnecessary. It deprives me of my right to ensure my son receives appropriate, evidence-based medical care as soon as such care is necessary to avoid or alleviate his suffering. As a mother, I am afraid of both the immediate and longstanding effects this lack of care will have on my child.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of June 2023.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Rita Soe", is written over a horizontal line.

Rita Soe